

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE DELTA DENTAL  
ANTITRUST LITIGATION

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)  
) CIVIL ACTION NO.  
) 1:19-cv-06734  
) Hon. Elaine E. Bucklo  
)

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING  
PAGE LIMITS FOR MOTIONS TO DISMISS**

Pursuant to Local Rule 7.1, Plaintiffs and Defendants, by and through the undersigned counsel, jointly submit this Stipulation and proposed Order regarding the page limits for Defendants' anticipated motions to dismiss.

WHEREAS, on November 26, 2019, Plaintiffs filed a Consolidated Complaint in the above-captioned litigation (Dkt. 96);

WHEREAS, under the Initial Case Management Order, Defendants' answers, motions, or other responses to the Consolidated Complaint are due January 27, 2020; Plaintiffs' oppositions to any motions to dismiss are due March 27, 2020; and Defendants' replies in support of any motions to dismiss are due April 27, 2020 (Dkt. 95 ¶¶ 19-20); and

WHEREAS, as required by the Initial Case Management Order ("CMO"), the parties have met and conferred regarding the appropriate page limits for Defendants' anticipated Motions to Dismiss and related briefing. CMO ¶ 22.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendants, that the page limits for the forthcoming Motions to Dismiss shall be as follows:

1. Defendants may file a joint brief of up to **50** pages on behalf of all Defendants in support of their joint motion to dismiss (“Joint Motion”) by January 27, 2020. Consistent with the CMO (§ 19), Defendants may also file by January 27, 2020 individual briefs and/or consolidated briefs in support of supplemental motions to dismiss addressing issues not common to all Defendants of not more than **5** pages if filed by an individual Defendant, or if filed jointly on behalf of more than one Defendant not more than **30** pages, provided that the total length of all such briefs collectively does not exceed **30** pages. Defendants agree that these additional 30 pages of briefs shall not be used to enlarge the 50-page limit for the all-defendant Joint Motion brief. Defendants also agree that while the individual or consolidated brief(s) may be on behalf of one or more individual Defendants with similar arguments, none of the 30 pages shall be submitted on behalf of all or most of the Defendants.

2. Plaintiffs may file a response brief of up to **60** pages in opposition to Defendants’ Joint Motion by March 27, 2020. Plaintiffs may also file by March 27, 2020 responses to Defendants’ individual/consolidated briefs of up to **5** pages if in response to an individual motion to dismiss, or up to **30** pages in response to a joint supplemental motion, provided that the total length of all such briefs collectively does not exceed **30** pages.

3. Defendants may file a reply brief of up to **25** pages in support of their Joint Motion by April 27, 2020. Defendants also may file individual replies of not more than **3** pages in support of any individual motion, or a consolidated reply of not more than **15** pages in support of any consolidated motion, provided that the total length of all such briefs collectively does not exceed **15** pages.

STIPULATED AND AGREED:

Dated: January 8, 2020

Respectfully submitted,

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**DATED:** \_\_\_\_\_

**SO ORDERED:**

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**Hon. Elaine E. Bucklo**

**CERTIFICATE OF SERVICE**

I, Britt M. Miller, an attorney, hereby certify that on January 8, 2020, I caused a true and correct copy of the foregoing **JOINT STIPULATION AND [PROPOSED] ORDER REGARDING PAGE LIMITS FOR MOTIONS TO DISMISS** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

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